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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

WAYNE HAGENDORF,) Case No. 2:18-cv-00960-JCM-BNW
Plaintiff,)) STIPULATION AND ORDER TO) EXTEND TIME FOR PLAINTIFF
v. LADAH LAW FIRM PLLC; and RAMZY LADAH;	 TO RESPOND TO DEFENDANTS' MOTION FOR SUMMARY JUDGMENT (FIRST REQUEST)
Defendants.)

The parties, by and through their respective counsel, hereby stipulate to extend the time for Plaintiff to respond to the Defendant's Motion for Summary Judgment (ECF No. 22) from the current due date of Tuesday, May 30, 2023 through and including *Tuesday*, *June 20*, 2023.

This is the first request for an extension of this deadline. The parties provide the following information to the Court regarding the proposed extension of time:

- Plaintiff's counsel was engaged in summary judgment briefing and Ninth Circuit appellate briefing during the time period since May 8, 2023 when the Defendants filed the unexpected Motion for Summary Judgment in this case;
- 2. Additionally, the parties have been discussing a possible resolution of this matter which will take a little more time in the next week or so to determine if

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1 an agreement can be reached. It makes sense to defer any work, that may 2 become unnecessary, on responding to the Motion for Summery Judgment 3 until after the parties conclude their negotiations. 4 This stipulation to extend the deadline is made in good faith and not for purposes of 5 delay. 6 May 29, 2023 7 KEMP & KEMP FENNEMORE CRAIG, P.C. 8 9 By: /s/ James P. Kemp, Esq. By: /s/ Richard I. Dreitzer, Esq. 10 7435 W. Azure Dr. 9275 W. Russell Road Suite 110 Suite 240 11 Las Vegas, Nevada 89130 Las Vegas, Nevada 89148 Attorneys for Plaintiff Attorneys for Defendants 12 13 ATTORNEYS AT LAW
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Tel. (702) 258-1183 \u03b8 Fax (702) 258-6983 14 IT IS SO ORDERED: 15 un C. Mahan 16 HON. JAMES C. MAHAN, DISTRICT JUDGE 17 May 30, 2023 Dated: 18 19 20 21 22 23 24 25 26 27 28